

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
WILLIAM FOSTER GLEASON	:	
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
WILLIAM FOSTER GLEASON	:	CASE NO. 1-24-bk-02832
Respondent	:	

TRUSTEE’S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 18th day of December 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)’ Plan for the following reason(s):

1. The Trustee avers that Debtor(s)’ Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid – 100% Plan (based on Means Test).
2. Secured claims not in Plan, specifically, Claims 1 and 5.

WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 18th day of December 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

CHARLES LAPUTKA ESQUIRE
1344 WEST HAMILTON STREET
ALLENTOWN, PA 18102-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee